

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AHMED MOHAMED,

Plaintiff,

-against-

METROPOLITAN LIFE INSURANCE
COMPANY,

Defendant.
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Docket No.: 10 CIV 7249 (PKC)

**DECLARATION OF
GREGORY HAFNER**

I, Gregory Hafner, declare:

1. I make this declaration in support of defendant Metropolitan Life Insurance Company's ("MetLife") Motion on Summary Trial. The matters stated here are based upon my personal knowledge and, if called upon to do so, I would and could testify competently to them.

2. I am an Assistant Vice President in Disability Product Management at Metropolitan Life Insurance Company ("MetLife"). I have personal knowledge of MetLife's claims handling practices and also of the measures that MetLife takes to ensure that the financial performance of the company is irrelevant to MetLife's disability claim determinations. I have been informed that the dates relevant to this litigation are from March 2007 forward. Prior to that date, and to the present, all of the procedures listed below have been in place.

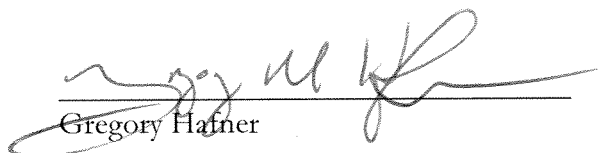
3. MetLife reviews each claim for group disability benefits on its own merits. Every claim determination is based solely upon the information in the individual claimant's claim file.

4. In order to ensure the integrity of its claims processing, MetLife's finances are kept separate from claims.

5. MetLife's claims offices are geographically separate from its finance offices.
6. Claims specialists and appeals specialists do not report up to Finance Department employees.
7. Finance Department employees do not make, direct, or have any association with claim determinations.
8. Claims specialists and appeals specialists do not have access to claim reserve information.
9. Claims specialists and appeals specialists receive no compensation, awards, bonuses, other financial benefits or performance recognition based upon either the value or the number of claims they deny or terminate.
10. Claims determinations are expected to be accurate regardless of the outcome of the determination.
11. MetLife administers all claims consistently, regardless of whether the plan is funded by the employer or by MetLife.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1ST day of JUNE, 2011 at Bridgewater New Jersey.


Gregory Hafner

CERTIFICATE OF SERVICE

I, Matthew P. Mazzola, hereby certify and affirm that a true and correct copy of the attached
DECLARATION OF GREGORY HAFNER, was served **via ECF and regular mail** on June 8,
2011, upon the following:

Michael Yoeli, Esq.
YOELI GOTTLIEB & ETRA LLP
260 Madison Avenue, 18th Floor
New York, New York 10016
Tel.: (212) 472-7270
Attorneys for Plaintiff

Dated: New York, New York
June 8, 2011

s/

Matthew P. Mazzola (MM-7427)